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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAS VEGAS POLICE PROTECTIVE ASSOCIATION  
METRO INC.; LAS VEGAS POLICE PROTECTIVE  
ASSOCIATION CIVILIAN EMPLOYEES, INC.; LAS  
VEGAS METRO POLICE MANAGERS &  
SUPERVISORS ASSOCIATION,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT;

Defendant.

**CASE NO. 2:15-cv-01928**

**NOTICE OF CONSTITUTIONAL  
CHALLENGE TO STATE STATUTE**

[Fed. Rule Civ. Pro. 5.1]

TO THE COURT AND NEVADA ATTORNEY GENERAL: PLEASE TAKE NOTICE  
that Plaintiffs' complaint in this action challenges the constitutionality under the First and  
Fourteenth Amendments of Section 1 of SB 241 (a ban on local governments providing  
paid leaves for union business).

Dated: October 7, 2015

McCRACKEN STEMERMAN & HOLSBERRY

By: /s/ Andrew J. Kahn

Andrew J. Kahn

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE VIA CERTIFIED MAIL**

I hereby certify that on October 7, 2015, I mailed a copy of *Notice of Constitutional Challenge to State Statute* to the parties listed below:

Liesl Freedman, General Counsel  
400 S. Martin Luther King Boulevard  
Las Vegas, Nevada 89106

Adam Paul Laxalt, Attorney General  
100 North Carson Street  
Carson City, NV 89701

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed on this 7th day, of October, 2015.

/s/Joy Medalle-Alferos  
Joy Medalle-Alferos